

Supplement to Reduction in Sentence Motion
Case # 3:20-cr-00010-jdp

Your Honor,

3-27-23

RECEIVED
MAR 28 2023
ME 1000

This case (US v. Goings, Lexis 19786) just came across the law library here, and directly addresses one of the extraordinary and compelling reasons I cited in my motion. The judge in this case used the same reasoning to grant the motion, concluding "...denial of opportunities for good time [First Step Act] credit reducing the length of his sentence - is, in this case, an 'extraordinary' reason to grant his motion." He noted "... had his case and pretrial detention ended - and his imprisonment begun - sooner, Defendant would have been freed months ago because "... but for his prolonged [pretrial] detention, he would have engaged in prison programs resulting in additional good time." While I wouldn't be home now if I hadn't had the extended pretrial detention due to COVID, I would have had 11 1/2 months knocked off my sentence, which is why I'm asking for a reduction rather than the immediate release the judge awarded in this case. The judge also echoed some of my arguments about 3553 factors, such as deterrence, noting "The public effect, to the extent it occurs, happens at pronouncement, not completion, of a criminal sentence." Since this case directly addressed an argument in my motion, I hope it can be considered. Thank you for your time.

Sincerely,

David Kruchten

David Kruchten - 11744090
Federal Correctional Institution
PO Box 1000
Milan, MI 48160